## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

| RENEE M. BUTZ,            | ) |                            |
|---------------------------|---|----------------------------|
|                           | ) |                            |
| Plaintiff,                | ) |                            |
|                           | ) |                            |
| V.                        | ) | Civ. No. 05-495-JJF        |
|                           | ) | Judge Joseph J. Farnan Jr. |
| LAWNS UNLIMITED, LTD. and | ) |                            |
| EDWARD FLEMING,           | ) |                            |
|                           | ) |                            |
| Defendants,               | ) |                            |

# PLAINTIFF'S RESPONSE TO DEFENDANTS' REQUESTED RELIEF FROM PLAINTIFF'S MOTION FOR PROTECTIVE ORDER

Plaintiff Renee Butz makes the following responses to Defendants' Edward Fleming and Lawns Unlimited, LTD's Requested Relief from Plaintiff's Motion for Protective Order.

#### FACTUAL & PROCEDRUAL BACKGROUND

- 1. Agreed
- 2. Plaintiff is seeking restoration from Defendants' for medical expenses incurred but not paid due to the loss of Plaintiff's medical insurance. Agreed that Plaintiff has demanded damages for "pain and suffering and emotional distress", however the pain and suffering and emotional distress were not the result of any medical treatment. The Plaintiff's pain and suffering resulted from unlawful termination of employment.

#### RELIEF REQUESTED

3. Therefore medical information for any period prior to or after December 2003 through March 2004 period is not required and not relevant to this case.

Filed 05/07/2007

- 4. Discovery not relevant to the subject matter.
- 5. Due to the Plaintiff's lack of medical coverage as a result of Defendants' termination on Plaintiff's employment and termination of Plaintiff's medical insurance, Plaintiff was unable seek medical assistance for the distress that Plaintiff was under.
- 6. Plaintiff is not seeking recovery of damages for harm resulting from factors unrelated to the discrimination.
- 7. No prior medical conditions or injuries were contributed to the Plaintiff's emotional distress.
- 8. Plaintiff therefore requests the court to uphold Plaintiff's Motion for Protective Order.

58 Hickory Drive North East, MD 21901

(410)441-4300 Plaintiff pro se

Dated: 5/5/07

### IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

| RENEE M. BUTZ,      |             | ) |                            |
|---------------------|-------------|---|----------------------------|
|                     | Plaintiff,  | ) |                            |
|                     | ,,          | ) |                            |
| v.                  |             | ) | Civ. No. 05-495-JJF        |
|                     |             | ) | Judge Joseph J. Farnan Jr. |
| LAWNS UNLIMITED LTD | . and       | ) |                            |
| EDWARD FLEMING,     |             | ) |                            |
|                     |             | ) |                            |
|                     | Defendants. | ) |                            |

#### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Plaintiff's Response to Defendants' Requested Relief from Plaintiff's Motion for Protective Order were sent by firstclass United States mail, postage duly paid, on this \_\_\_\_\_\_\_, and \_\_\_\_\_\_\_\_, 2007, to counsel of record as follows:

Margaret M. DiBianca Young Conaway Stargatt & Taylor, LLP The Brandywine Building, 17th Floor 1000 West Street Wilmington, DE 19801

> 58 Hickory Drive North East, MD 21901 (410) 441-4300

Plaintiff pro se

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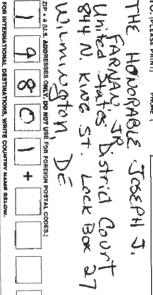
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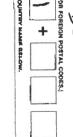
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